

2028 NE 96th St.
Seattle, WA 98115
21 August 2004

Susan Childs, Project Manager
Northeast National Petroleum Reserve-Alaska
Plan Amendment
Bureau of Land Management
Alaska State Office (930)
222 West 7th Avenue
Anchorage, AK 99513-7599

196945

Dear Project Manager Childs:

1 I have traveled in Alaska a number of times over the past three decades. My first trip to Alaska was to the central Brooks Range in 1974, before the Gates of the Arctic was established as a National Park and the northern boundary of the Park was still under consideration. Since then, I have led or co-led a number of base camp, hiking and kayaking trips throughout Alaska, primarily in the Brooks Range, the Arctic National Wildlife Refuge, and Southeast Alaska. During the course of those trips, I've had some amazing wilderness experiences. And of course I've seen many species of wildlife and birds in their natural habitat, following their life course during the brief and intense Arctic spring/summer.

2 The undeveloped areas of Alaska encompass real wilderness, the likes of which are not found in many places on our planet. This wilderness resource supports an amazing variety of wildlife, even in Arctic Alaska, even in the NPR-A. The 23-million-acre Reserve is the largest single block of wilderness in America. The Western Arctic is home to world-class populations of golden eagles, peregrine falcons, migratory waterfowl, grizzly bears, wolves, polar bears, spotted seals, beluga whales and caribou, among many other species, in a diversity of ecosystems from the foothills of the Brooks Range to the icy coastal lagoons to the extensive network of wetlands.

3 This letter is to express my extreme disappointment with the plan that would open up 96% of the northeast planning area of the NPR-A to oil and gas development. I am opposed to indiscriminate oil and gas development across millions of acres of wildlands and wetlands. Instead of opening vast stretches of the NPR-A to such development, a more prudent approach would be to select the least sensitive areas and leave the sensitive areas alone. In addition, any development must be conducted in the most environmentally-responsible manner.

Teshkepuk Lake

Teshkepuk Lake is the crown jewel of the northeast unit of the NPR-A. It is also the biological heart of this region. It is particularly irresponsible to allow development anywhere near this spectacular lake, with its associated network of coastal lagoons, lakes, river deltas, and wet sage

4

grass meadows. This wetland region provides nesting or molting habitat for 60,000 geese from three countries, including threatened spectacled eiders, Stellar's eiders and black brant. It is also the calving ground for the 45,000-animal Teshekpuk Lake Caribou Herd.

5

The BLM proposed reduction of the Teshekpuk Lake Surface Protection Area to 213,000 acres is completely inadequate to protect the wildlife resources.

Impacts to Native Subsistence/Culture

6

Portions of the NPR-A have been utilized by Native peoples for their very survival for thousands of years, possibly over 11,000 years. Barrow is one of the oldest inhabited sites in the United States, having been occupied for 4,500 years. It is for this reason that many sites considered sacred to the Inupiat are found within the Reserve. This region is also of great significance for scientists studying paleontology, archaeology and the Pleistocene Ice Age.

007
Caribou

Inupiat villagers depend upon the caribou of the lake region for their subsistence. Development activities would disrupt caribou calving or force pregnant cows to move to other, less biologically suitable areas to have their calves. Despite rosy reports to the contrary from the oil industry at Prudhoe Bay about caribou which roam through the oil fields, female caribou with their young calves avoid the pipeline and oil development activities. Not only would development in this area upset the delicate balance of the caribou during the calving season, it would disrupt forever the way of life of the people of Nuiqsut village.

Alternative A

8

When the NPR-A was transferred from the Navy to the Department of Interior, Congress wisely directed the Secretary of the Interior to provide protection for "special areas" of particular ecological value. In 1999, Secretary Bruce Babbitt set aside 700,000 acres for special protection and placed restrictions on other areas. These special protections and restrictions were reaffirmed during the 2002 lease sale. Each of these restrictions have included Teshekpuk Lake, since one Administration after the next has recognized the high ecological value of the lake complex and has been willing to protect this region.

9

I strongly urge the BLM to adopt Alternative A, no action. Any other alternative would cause irreparable harm to Teshekpuk Lake Surface Protection Area. Eighty-seven percent of the northeastern Reserve is already open to oil and gas leasing. The ecological integrity of Teshekpuk Lake, and its associated wetlands, must be preserved.

Thank you for this opportunity to comment.

Sincerely,



Karen M. Fant